

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

4:13CR497 CDP/TCM

No.

COUNT ONE

3. In April 2010, Spears made and caused to be made a material false representation about her income on a Uniform Residential Loan Application submitted in support of a FHA loan to finance her purchase of the property at 504 Wyndgate Lake Court, Lake St. Louis, Missouri 63367. Specifically, Spears falsely claimed that her monthly income was \$8,408.96, when in

truth and fact, as Spears well knew, her monthly income was less than \$8,408.96. Had Spears accurately stated her correct monthly income, her application for the FHA loan would have been rejected.

4. On or about April 30, 2010, in reliance on the material false representation made by Spears as to her monthly income, the United States guaranteed a loan of \$272,332 for Spears' purchase of the property at 504 Wyndgate Lake Court, Lake St. Louis, Missouri 63367. Spears subsequently stopped making payments on the FHA loan and the property at 504 Wyndgate Lake Court, Lake St. Louis, Missouri 63367 went into default.

5. On or about April 30, 2010, in the Eastern District of Missouri, the defendant,

KYRIA SPEARS,

did knowingly and willfully make and cause to be made a materially false, fictitious, and fraudulent statement and representation regarding her monthly wages relating to a matter within the jurisdiction of the United States, to wit: a mortgage loan guaranteed by the Federal Housing Administration, United States Department of Housing and Urban Development in which she claimed that she earned \$8,408.96 in monthly income.

In violation of Title 18, United States Code, Section 1001(a) and 2.

A TRUE BILL,

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

ANTHONY L. FRANKS, #50217MO